

1 Peter Strojnik,
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5 **UNITED STATES DISTRICT COURT**
6 **WESTERN DISTRICT OF WASHINGTON**

7 Case No. **18 CV 1832**
MAT

8 Peter Strojnik,

VERIFIED COMPLAINT

9 Plaintiff,

1. Americans with Disabilities

Act

2. Negligence

10 vs.

JURY TRIAL REQUESTED

11
12 Seattle Hotel Group, LLC dba Four
13 Seasons Seattle

14 Defendant.

15
16 1. Plaintiff brings this action pursuant to the (1) Americans with Disabilities Act, 42
17 U.S.C. §12101 *et seq.* and corresponding regulations, 28 CFR Part 36 and
18 Department of Justice Standards for Accessible Design (“ADA”) and (2) common
19 law of negligence per se.

20 **PARTIES**

- 21 2. Plaintiff Peter Strojnik is a veteran and a disabled person as defined by the ADA.
- 22 3. Plaintiff is a single man currently residing in Maricopa County, Arizona. Plaintiff is
23 and, at all times relevant hereto has been, legally disabled by virtue of a severe
24 right-sided neural foraminal stenosis with symptoms of femoral neuropathy, prostate
25 cancer and renal cancer, degenerative right knee and is therefore a member of a
26 protected class under the ADA.
- 27 4. Plaintiff suffers from physical impairments described above which impairments
28 substantially limit his major life activities. Plaintiff walks with difficulty and pain
and requires compliant mobility accessible features at places of public

accommodation. Plaintiff's impairment is constant, but the degree of pain is episodic ranging from dull and numbing pain to extreme and excruciating agony.

5. Defendant, owns, operates leases or leases to a lodging business ("Hotel") located at 99 Union Street, Seattle WA 98101 which is a public accommodation pursuant to 42 U.S.C. § 12181(7)(A) which offers public lodging services *See* 28 CFR §36.104 and a listing of public accommodations in 42 U.S.C. §12181(7).

JURISDICTION

6. District Court has jurisdiction over this case or controversy by virtue of 28 U.S.C. §§ 28-1331 and 42 U.S.C. § 12188 and 28 U.S.C. § 1367.

7. Plaintiff brings this action as a private attorney general who has been personally subjected to discrimination on the basis of his disability, *see* 42 U.S.C. §12188 and 28 CFR §36.501.

8. This Court has continuing subject matter jurisdiction by virtue of, *inter alia*, Plaintiff's claim for equitable nominal damages.

9. Venue is proper pursuant to 28 U.S.C. § 1391.

10. The ADAAG violations in this Verified Complaint relate to barriers to Plaintiffs mobility. This impairs Plaintiff's full and equal access to the Hotel which, in turn, constitutes discrimination satisfying the "injury in fact" requirement of Article III of the United States Constitution.

11. Plaintiff is deterred from visiting the Hotel based on Plaintiff's knowledge that the Hotel is not ADA compliant as such compliance relates to Plaintiff's disability.

12. Plaintiff intends to visit Defendant's Hotel at a specific time when the Defendant's noncompliant Hotel becomes fully compliant with ADAAG; just as a disabled individual who intends to return to a noncompliant facility suffers an imminent injury from the facility's existing or imminently threatened noncompliance with the ADA, a plaintiff who is deterred from patronizing a store suffers the ongoing actual injury of lack of access to the Hotel.

COUNT ONE

Violation of Plaintiff's Civil Rights under the ADA

13. Plaintiff realleges all allegations heretofore set forth.

14. By virtue of his disability, Plaintiff requires an ADA compliant lodging facility particularly applicable to his mobility, both ambulatory and wheelchair assisted.

15. Plaintiff intended to vacation in Washington and therefore, reviewed vacation booking websites as documented in Addendum A.

16. Air booking websites took Plaintiff to third party hotel booking websites as documented in Addendum A.

17. Plaintiff became aware that third party booking websites disclosed general availability and description of Defendant's Hotel. Third Party booking websites referenced here are more fully documented in Addendum A which is by this reference incorporated herein.

18. Third party booking websites failed to identify and describe mobility related accessibility features and guest rooms offered through its reservations service in enough detail to reasonably permit Plaintiff to assess independently whether Defendant's Hotel meets his accessibility needs as more fully documented in Addendum A.

19. Third party booking websites also failed to make reservations for accessible guest rooms available in the same manner as individuals who do not need accessible rooms. *See* Addendum A.

20. Thereafter, Plaintiff became aware that Defendant's 1st party booking website failed to identify and describe mobility related accessibility features and guest rooms offered through its reservations service in enough detail to reasonably permit Plaintiff to assess independently whether Defendant's Hotel meets his accessibility needs as more fully documented. *See* Addendum A.

21. Plaintiff also became aware that Defendant's 1st party booking website failed to make reservations for accessible guest rooms available in the same manner as individuals who do not need accessible rooms. *See* Addendum A.

22. Because third and first party booking agents failed to identify and describe mobility related accessibility features and guest rooms offered through its reservations

1 service in enough detail to reasonably permit Plaintiff to assess independently
2 whether Defendant's Hotel meets his accessibility needs Plaintiff declined to book a
3 room there and because Plaintiff was unable to make reservations for accessible
4 guest rooms available in the same manner as individuals who do not need accessible
5 rooms, Plaintiff declined to book a room there.

6 23. Plaintiff thereafter reviewed Defendant's online information relating to accessibility
7 or lack thereof, including in particular photographs of the amenities at the Hotel all
8 as more fully documented in Addendum A.

9 24. Online information relating to accessibility or lack thereof disclosed Defendant's
10 non-compliance with architectural barriers to accessibility as more fully documented
11 in Addendum A.

12 25. Defendant has violated the ADA by denying Plaintiff equal access to its public
13 accommodation on the basis of his disability as outlined above and as outlined in
14 Addendum A.

15 26. The ADA violations described in Addendum A relate to Plaintiff's disability and
16 interfere with Plaintiff's full and complete enjoyment of the Hotel.

17 27. As a result of the deficiencies described above, Plaintiff declined to book a room at
18 Defendant's Hotel and instead booked a room elsewhere.

19 28. The removal of accessibility barriers listed above is readily achievable.

20 29. As a direct and proximate result of ADA Violations, Defendant's failure to remove
21 accessibility barriers prevented Plaintiff from equal access to the Defendant's public
22 accommodation.

WHEREFORE, Plaintiff prays for all relief as follows:

23 A. Relief described in 42 U.S.C. §2000a – 3; and

24 B. Relief described in 42 U.S.C. § 12188(a) and (b) and, particularly -

25 C. Injunctive relief order to alter Defendant's place of public accommodation to
26 make it readily accessible to and usable by ALL individuals with disabilities;
27 and
28

- D. Requiring the provision of an auxiliary aid or service, modification of a policy, or provision of alternative methods, to the extent required by Subchapter III of the ADA; and
- E. Equitable nominal damages; and
- F. For costs, expenses and attorney's fees; and
- G. All remedies provided for in 28 C.F.R. 36.501(a) and (b).

COUNT TWO
Negligence

30. Plaintiff realleges all allegations heretofore set forth.

31. Defendant had a duty to Plaintiff to remove ADA accessibility barriers so that Plaintiff as a disabled individual would have full and equal access to the Hotel.

32. Defendant breached this duty.

33. Defendant's knowing and intentional discrimination against Plaintiff reinforces above forms of discrimination, causing Plaintiff damage.

34. Defendant's knowing and intentional discrimination has relegated Plaintiff to an inferior status in society, causing Plaintiff damage.

35. Defendant's knowing and intentional unfair and unnecessary discrimination against Plaintiff demonstrates Defendant's knowing and intentional damage to Plaintiff.

36. Defendant's breach of duty caused Plaintiff damages including, without limitation, the feeling of segregation, discrimination, relegation to second class citizen status the pain, suffering and emotional damages inherent to discrimination and segregation and other damages to be proven at trial.

37. By violating Plaintiff's civil rights, Defendant engaged in intentional, aggravated and outrageous conduct.

38. The ADA has been the law of the land since 1991, but Defendant engaged in a conscious action of a reprehensible character, that is, Defendant denied Plaintiff his civil rights, and cause him damage by virtue of segregation, discrimination, relegation to second class citizen status the pain, suffering and emotional damages inherent to discrimination and segregation and other damages to be proven at trial

1 39. Defendant either intended to cause injury to Plaintiff or defendant consciously
2 pursued a course of conduct knowing that it created a substantial risk of significant
3 harm to Plaintiff.

4 40. Defendant is liable to Plaintiff for punitive damages in an amount to be proven at
5 trial sufficient, however, to deter this Defendant and others similarly situated from
6 pursuing similar acts.

7 **WHEREFORE**, Plaintiff prays for relief as follows:

- 8 A. For finding of negligence; and
9 B. For damages in an amount to be proven at trial; and
10 C. For punitive damages to be proven at trial; and
11 D. For such other and further relief as the Court may deem just and proper.

12 **REQUEST FOR TRIAL BY JURY**

13 Plaintiff respectfully requests a trial by jury in issues triable by a jury.

14 **VERIFICATION**

15 I declare under penalty of perjury that the foregoing is true and correct to the best
16 of my knowledge, information and/or belief.

17 RESPECTFULLY SUBMITTED this 13th day of December, 2018.

18 **PETER STROJNIK**

19 
20 _____
21 Plaintiff
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ADDENDUM A

ADA VIOLATIONS	
3 RD PARTY BOOKING WEBSITE - HOTELS.COM	
Main amenities <ul style="list-style-type: none"> ✓ 147 smoke-free guestrooms ✓ Restaurant and bar/lounge ✓ Full-service spa ✓ Outdoor pool ✓ Breakfast available ✓ 24-hour fitness center ✓ Free WiFi ✓ Valet parking ✓ 24-hour business center ✓ Limotown car service ✓ 24-hour front desk ✓ Air conditioning ✓ Daily housekeeping 	

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

About Four Seasons Hotel Seattle, Seattle	
<p>Luxury hotel with infinity pool, 1 block from Pike Place</p> <p>Pike Place Market and art</p> <p>Four Seasons Hotel Seattle is in downtown Seattle, a block south of Pike Place Market and across the street from Seattle Art Museum. You can stroll 10 minutes south to reach Pioneer Square and 10 minutes northeast for shopping at Pacific Place mall and Nordstrom.</p> <p>Sea life and Ferris wheel</p> <p>You can see the sea otters and harbor seals frolic at the Seattle Aquarium, situated on Elliott Bay a 5-minute walk west of the hotel. The views of the bay and the city are spectacular from the</p>	<p>waterfront Great Wheel Ferris wheel, a 5-minute walk southwest.</p> <p>Rooftop pool, day spa</p> <p>Overlooking Elliott Bay and open year-round, the rooftop terrace features an infinity-edge pool, hot tub, poolside service in summer, and an outdoor fireplace in winter. The hotel also has a 24-hour fitness center, day spa, cocktail lounge, and restaurant with Pacific cuisine.</p> <p>Bay or city views</p> <p>Decorated in a sophisticated Northwest style, the 147 guestrooms feature floor-to-ceiling windows with bay or city views. You can settle back on premium bedding and watch a DVD on the 48-inch plasma TV or go online via free WiFi; marble baths include mirrors with integrated TVs.</p>

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

Key facts	Travelling with others
<p>Hotel size</p> <ul style="list-style-type: none"> • This hotel has 147 rooms • This hotel is arranged over 10 floors <p>Arriving/leaving</p> <p>96% of customers were happy with check-in</p> <ul style="list-style-type: none"> • Check-in time starts at 3 PM • Check-out time is noon • Express check-in <p>Required at check in</p> <ul style="list-style-type: none"> • Credit card deposit required • Government-issued photo ID required • Minimum check-in age is 18 	<p>Children</p> <ul style="list-style-type: none"> ✓ Children (17 years old and younger) stay free when occupying the parent or guardian's room, using existing bedding <p>Pets</p> <ul style="list-style-type: none"> ✓ Pets allowed * ✓ Up to 20 lb <p>Internet</p> <ul style="list-style-type: none"> ✓ Free WiFi in public areas ✓ Free WiFi in rooms

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

In the hotel

Food and drink	Cooked-to-order breakfast daily (surcharge) Restaurant Bar/lounge Poolside bar 24-hour room service
Things to do	Bicycle rentals nearby Ecotours nearby Golf lessons available nearby Golfing nearby Hiking/biking trails nearby Kayaking nearby Mountain biking nearby Sailing nearby Scooter/moped rentals nearby Segway rental/tour nearby Water skiing nearby
Working away	24-hour business center Conference space Meeting rooms Conference space size (feet) - Conference space size (meters) -
Services	24-hour front desk Concierge services Tours/ticket assistance Limo or Town Car service available Dry cleaning/laundry service Laundry facilities Luggage storage Wedding services Multilingual staff Porter/bellhop
Facilities	Number of buildings/towers - Elevator/lift ATM/banking Safe-deposit box at front desk
Accessibility	Accessible bathroom In-room accessibility Roll-in shower
Languages Spoken	Chinese English French Spanish

Accessibility

Accessible bathroom | In-room accessibility | Roll-in shower

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

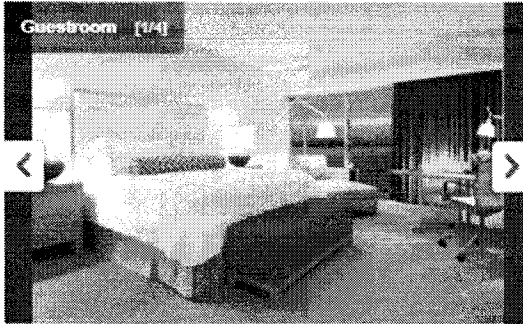
In the room

Home comforts	In-room climate control (air conditioning) Air conditioning Minibar Bathrobes Slippers Iron/ironing board
Sleep well	Hypo-allergenic bedding available Down comforter Blackout drapes/curtains Tumdown service Pillowtop mattress
Things to enjoy	In-room massage available
Freshen up	Private bathroom Separate bathtub and shower Designer toiletries Hair dryer
Be entertained	48-inch plasma TV Pay movies Premium TV channels iPod docking station DVD player Video-game console
Stay connected	Desk Free newspaper Free WiFi
Food and drink	Refrigerator (on request) Microwave (on request)
More	Daily housekeeping In-room safe (laptop compatible) Connecting/adjoining rooms available

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

Room, 1 King Bed, Partial View

Guestroom [141]



Sleeps 3 people (including up to 2 children)

Bed choices

- 1 King Bed

Extra beds available

- Crib • Rollaway bed

More info: 866-539-8117

1 King Bed

450-sq-foot (41-sq-meter) room with bay views

Relax - In-room massage available

Internet - Free WiFi

Entertainment - 48-inch plasma TV with premium channels, pay movies, iPod dock

Food & Drink - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)

Sleep - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service

Bathroom - Private bathroom, separate bathtub and shower, bathrobes, and slippers

Practical - Laptop-compatible safe, free newspaper, and ironing board; free rollaway/extra beds and free crib/infant beds available on request

Comfort - Air conditioning and daily housekeeping

Non-Smoking

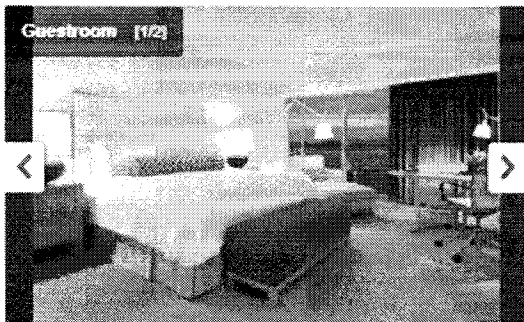
Connecting/adjoining rooms can be requested, subject to availability

Details

- | | | |
|--|--|-------------------------------|
| • Air conditioning | • HDTV | • Pay movies |
| • Bathrobes | • Hypo-allergenic bedding available | • Pillowtop mattress |
| • Blackout drapes/curtains | • In-room climate control (air conditioning) | • Plasma TV |
| • Connecting/adjoining rooms available | • In-room massage available | • Premium TV channels |
| • Daily housekeeping | • In-room safe (laptop compatible) | • Private bathroom |
| • Designer toiletries | • iPod docking station | • Refrigerator (on request) |
| • Desk | • Iron/ironing board | • Room service (24 hours) |
| • Digital TV service | • Microwave (on request) | • Separate bathtub and shower |
| • Down comforter | • Minibar | • Slippers |
| • DVD player | • Number of bathrooms | • Turndown service |
| • Free newspaper | | • Video-game console |
| • Free toiletries | | |
| • Free WiFi | | |
| • Hair dryer | | |

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Improper dispersion: Hotel does not offer accessible rooms in this category with the effect that the charge for the accessible room demands a premium. This room rents for \$619. The least expensive accessible room charges \$699.

Room: 2 Double Beds, Partial View



2 Double Beds
450-sq-foot (42-sq-meter) room with bay views

Relax - In-room massage available
Internet - Free WiFi
Entertainment - 43-inch plasma TV with premium channels, pay movies, iPod dock
Food & Drink - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)
Sleep - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service
Bathroom - Private bathroom, separate bathtub and shower, bathrobes, and slippers
Practical - Laptop-compatible safe, free newspaper, and iron/ironing board
Comfort - Air conditioning and daily housekeeping
Need to Know - No cribs (infant beds) or rollaway/extra beds available
Non-Smoking
 Connecting/adjoining rooms can be requested, subject to availability

Bed choices

- 2 Double Beds

More info: 866-538-8117

Details

- Air conditioning
- Bathrobes
- Blackout drapes/curtains
- Connecting/adjoining rooms available
- Daily housekeeping
- Designer toiletries
- Desk
- Digital TV service
- Down comforter
- DVD player
- Free newspaper
- Free toiletries
- Free WiFi
- Hair dryer
- HDTV
- Hypo-allergenic bedding available
- In-room climate control (air conditioning)
- In-room massage available
- In-room safe (laptop compatible)
- iPod docking station
- Iron/ironing board
- Microwave (on request)
- Minibar
- Number of bathrooms -
- Pay movies
- Pillowtop mattress
- Plasma TV
- Premium TV channels
- Private bathroom
- Refrigerator (on request)
- Room service (24 hours)
- Separate bathtub and shower
- Slippers
- Turndown service
- Video-game console

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Inadequate dispersion.

Deluxe Bay-View Room, One King Bed**Guestroom [1/2]****1 King Bed**

470-sq-foot (44-sq-meter) room with bay views

Relax - In-room massage available**Internet** - Free WiFi**Entertainment** - 42-inch plasma TV with premium channels, pay movies, iPod dock**Food & Drink** - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)**Sleep** - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service**Bathroom** - Private bathroom, separate bathtub and shower, bathrobes, and slippers**Practical** - Laptop-compatible safe, free newspaper, and iron/ironing board, free rollaway/extra beds and free crib/infant beds available on request**Comfort** - Air conditioning and daily housekeeping**Non-Smoking**

Connecting/adjoining rooms can be requested, subject to availability

Sleeps 3 people (including up to 2 children)

Bed choices

- 1 King Bed

Extra beds available

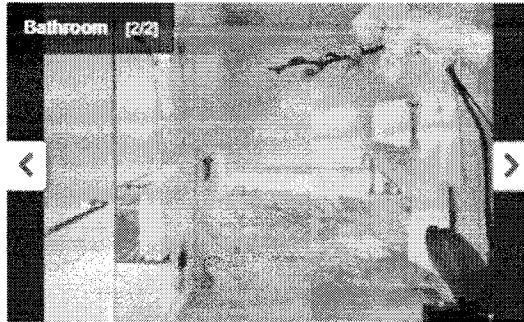
- Crib • Rollaway bed

More info: 888-538-6117

Details

- | | | |
|--|--|-------------------------------|
| • Air conditioning | • HDTV | • Pay movies |
| • Bathrobes | • Hypo-allergenic bedding available | • Pillowtop mattress |
| • Blackout drapes/curtains | • In-room climate control (air conditioning) | • Plasma TV |
| • Connecting/adjoining rooms available | • In-room massage available | • Premium TV channels |
| • Daily housekeeping | • In-room safe (laptop compatible) | • Private bathroom |
| • Designer toiletries | • iPod docking station | • Refrigerator (on request) |
| • Desk | • Iron/ironing board | • Room service (24 hours) |
| • Digital TV service | • Microwave (on request) | • Separate bathtub and shower |
| • Down comforter | • Minibar | • Slippers |
| • DVD player | • Number of bathrooms | • Turndown service |
| • Free newspaper | | • Video-game console |
| • Free toiletries | | |
| • Free WiFi | | |
| • Hair dryer | | |

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Inadequate dispersion.

One King Bed, Bay View, Accessible

Sleeps 3 people (including up to 2 children)

Bed choices

- 1 King Bed

Extra beds available

- Crib • Rollaway bed

More info: 866-539-5117

1 King Bed

470-sq-foot (44-sq-meter) room with bay views

Relax - In-room massage available

Internet - Free WiFi

Entertainment - 43-inch plasma TV with premium channels, pay movies, iPod dock

Food & Drink - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)

Sleep - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service

Bathroom - Private bathroom, separate bathtub and shower, bathrobes, and slippers

Practical - Laptop-compatible safe, free newspaper, and iron/ironing board; free rollaway/extra beds and free cribs/infant beds available on request

Comfort - Air conditioning and daily housekeeping

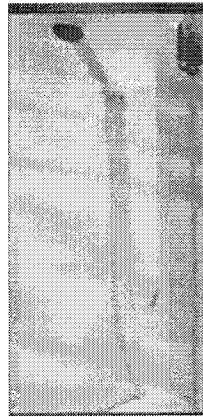
Non-Smoking

Connecting/adjoining rooms can be requested, subject to availability

Details


- | | | |
|--|--|-------------------------------|
| • Air conditioning | • HDTV | • Pay movies |
| • Bathrobes | • Hypo-allergenic bedding available | • Pillowtop mattress |
| • Blackout drapes/curtains | • In-room climate control (air conditioning) | • Plasma TV |
| • Connecting/adjoining rooms available | • In-room massage available | • Premium TV channels |
| • Daily housekeeping | • In-room safe (laptop compatible) | • Private bathroom |
| • Designer toiletries | • iPod docking station | • Refrigerator (on request) |
| • Desk | • Iron/ironing board | • Room service (24 hours) |
| • Digital TV service | • Microwave (on request) | • Separate bathtub and shower |
| • Down comforter | • Minibar | • Slippers |
| • DVD player | • Number of bathrooms - | • Turn-down service |
| • Free newspaper | | • Video-game console |
| • Free toiletries | | |
| • Free WiFi | | |
| • Hair dryer | | |





ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Inadequate dispersion. The photo of bathroom shows inaccessible tub and improper shower enclosure and shower spray unit configuration.

Deluxe Bay-View Room, Two Double Beds



2 Double Beds
470-sq-foot (44-sq-meter) room with bay views

Relax - In-room massage available
Internet - Free WiFi
Entertainment - 43-inch plasma TV with premium channels, pay movies, iPod dock
Food & Drink - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)
Sleep - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service
Bathroom - Private bathroom, separate bathtub and shower, bathrobes, and slippers
Practical - Laptop-compatible safe, free newspaper, and iron/ironing board
Comfort - Air conditioning and daily housekeeping
Need to Know - No cribs (infant beds) or rollaway/extra beds available
 Non-Smoking
 Connecting/adjoining rooms can be requested, subject to availability

Bed choices

- 2 Double Beds

More info: \$96-\$39-\$117

Details

- Air conditioning
- Bathrobes
- Blackout drapes/curtains
- Connecting/adjoining rooms available
- Daily housekeeping
- Designer toiletries
- Desk
- Digital TV service
- Down comforter
- DVD player
- Free newspaper
- Free toiletries
- Free WiFi
- Hair dryer
- HDTV
- Hypo-allergenic bedding available
- In-room climate control (air conditioning)
- In-room massage available
- In-room safe (laptop compatible)
- iPod docking station
- Iron/ironing board
- Microwave (on request)
- Minibar
- Number of bathrooms -
- Pay movies
- Pillowtop mattress
- Plasma TV
- Premium TV channels
- Private bathroom
- Refrigerator (on request)
- Room service (24 hours)
- Separate bathtub and shower
- Slippers
- Turndown service
- Video-game console

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Inadequate dispersion.

Deluxe Bay-View Accessible Room

Sleeps 4 people (including up to 3 children)

Bed choices

- 2 Double Beds

More info: 888-539-3117

2 Double Beds

470-sq-foot (44-sq-meter) room with bay views

Relax - In-room massage available

Internet - Free WiFi

Entertainment - 48-inch plasma TV with premium channels, pay movies, iPod dock

Food & Drink - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)

Sleep - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service

Bathroom - Private bathroom, separate bathtub and shower, bathrobes, and slippers

Practical - Laptop-compatible safe, free newspaper, and iron/ironing board

Comfort - Air conditioning and daily housekeeping

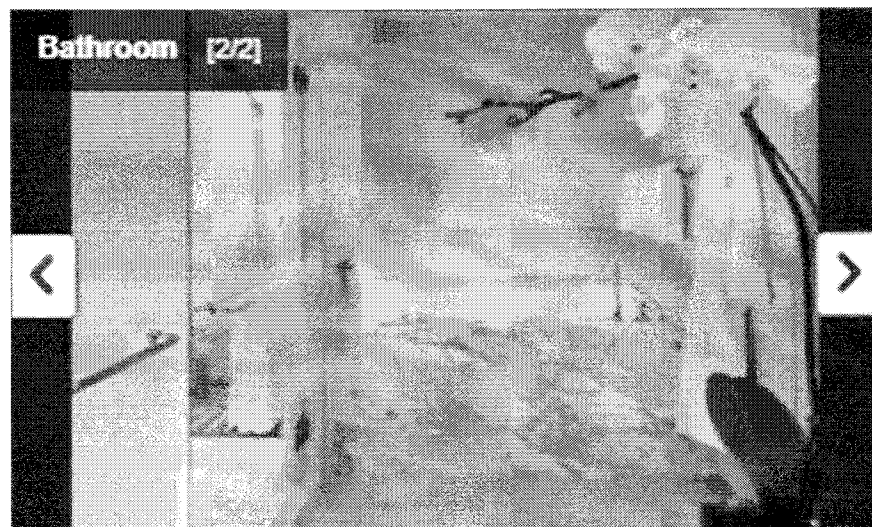
Need to Know - No cribs (infant beds) or rollaway/extra beds available

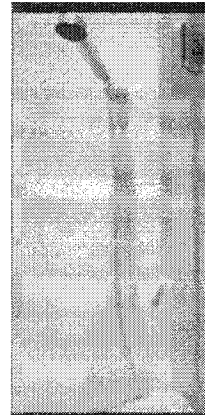
Non-Smoking

Connecting/adjoining rooms can be requested, subject to availability

Details


- | | | |
|--|--|-------------------------------|
| • Air conditioning | • HDTV | • Pay movies |
| • Bathrobes | • Hypo-allergenic bedding available | • Pillowtop mattress |
| • Blackout drapes/curtains | • In-room climate control (air conditioning) | • Plasma TV |
| • Connecting/adjoining rooms available | • In-room massage available | • Premium TV channels |
| • Daily housekeeping | • In-room safe (laptop compatible) | • Private bathroom |
| • Designer toiletries | • iPod docking station | • Refrigerator (on request) |
| • Desk | • Iron/ironing board | • Room service (24 hours) |
| • Digital TV service | • Microwave (on request) | • Separate bathtub and shower |
| • Down comforter | • Minibar | • Slippers |
| • DVD player | • Number of bathrooms - | • Turndown service |
| • Free newspaper | | • Video-game console |
| • Free toiletries | | |
| • Free WiFi | | |
| • Hair dryer | | |





ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Inadequate dispersion. The photo of bathroom shows inaccessible tub and improper shower enclosure and shower spray unit configuration.

Room, 1 King Bed, Bay View (Prime)



1 King Bed
498-sq-foot (46-sq-meter) room with bay views

Relax - In-room massage available
Internet - Free WiFi
Entertainment - 48-inch plasma TV with premium channels, pay movies, iPod dock
Food & Drink - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)
Sleep - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service
Bathroom - Private bathroom, separate bathtub and shower, bathrobes, and slippers
Practical - Laptop-compatible safe, free newspaper, and iron/ironing board; free rollaway/extra beds and free cribs/infant beds available on request
Comfort - Air conditioning and daily housekeeping
Non-Smoking
 Connecting/adjoining rooms can be requested, subject to availability

Bed choices

- 1 King Bed

Extra beds available

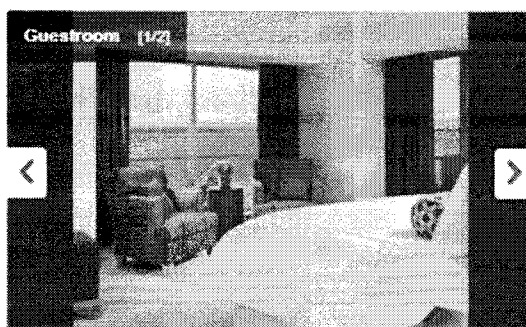
- Crib • Rollaway bed

More info: 888-539-8117

Details

• Air conditioning	• HDTV	• Pay movies
• Bathrobes	• Hypo-allergenic bedding available	• Pillowtop mattress
• Blackout drapes/curtains	• In-room climate control (air conditioning)	• Plasma TV
• Connecting/adjoining rooms available	• In-room massage available	• Premium TV channels
• Daily housekeeping	• In-room safe (laptop compatible)	• Private bathroom
• Designer toiletries	• iPod docking station	• Refrigerator (on request)
• Desk	• Iron/ironing board	• Room service (24 hours)
• Digital TV service	• Microwave (on request)	• Separate bathtub and shower
• Down comforter	• Minibar	• Slippers
• DVD player	• Number of bathrooms -	• Turndown service
• Free newspaper		• Video-game console
• Free toiletries		
• Free WiFi		
• Hair dryer		

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Inadequate dispersion.

Suite, 1 King Bed, Corner

Sleeps 3 people (including up to 2 children)

Bed choices

- 1 King Bed

Extra beds available

- Crib • Rollaway bed

More info: 866-539-8117

1 King Bed

765-sq-foot (74-sq-meter) room with bay views

Relax - In-room massage available

Internet - Free WiFi

Entertainment - 43-inch plasma TV with premium channels, pay movies, iPod dock

Food & Drink - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)

Sleep - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service

Bathroom - Private bathroom, separate bathtub and shower, bathrobes, and slippers

Practical - Laptop-compatible safe, free newspaper, and iron/ironing board; free rollaway/extra beds and free crib/infant beds available on request

Comfort - Air conditioning and daily housekeeping

Non-Smoking

Connecting/adjoining rooms can be requested, subject to availability

Details

- | | | |
|--|--|-------------------------------|
| • Air conditioning | • HDTV | • Pay movies |
| • Bathrobes | • Hypo-allergenic bedding available | • Pillowtop mattress |
| • Blackout drapes/curtains | • In-room climate control (air conditioning) | • Plasma TV |
| • Connecting/adjoining rooms available | • In-room massage available | • Premium TV channels |
| • Daily housekeeping | • In-room safe (laptop compatible) | • Private bathroom |
| • Designer toiletries | • iPod docking station | • Refrigerator (on request) |
| • Desk | • Iron/ironing board | • Room service (24 hours) |
| • Digital TV service | • Microwave (on request) | • Separate bathtub and shower |
| • Down comforter | • Minibar | • Slippers |
| • DVD player | • Number of bathrooms - | • Turndown service |
| • Free newspaper | | • Video-game console |
| • Free toiletries | | |
| • Free WiFi | | |
| • Hair dryer | | |

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Inadequate dispersion.

Deluxe Suite, 1 King Bed**1 King Bed**

1150-sq-foot (111-sq-meter) room with bay views

Relax - In-room massage available

Internet - Free WiFi

Entertainment - 43-inch plasma TV with premium channels, pay movies, iPod dock

Food & Drink - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)

Sleep - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service

Bathroom - Private bathroom, separate bathtub and shower, bathrobes, and slippers

Practical - Laptop-compatible safe, free newspaper, and iron/ironing board; free rollaway/extra beds and free cribs/infant beds available on request

Comfort - Air conditioning and daily housekeeping

Non-Smoking

Connecting/adjoining rooms can be requested, subject to availability

Sleeps 3 people (including up to 2 children)

Bed choices

- 1 King Bed

Extra beds available

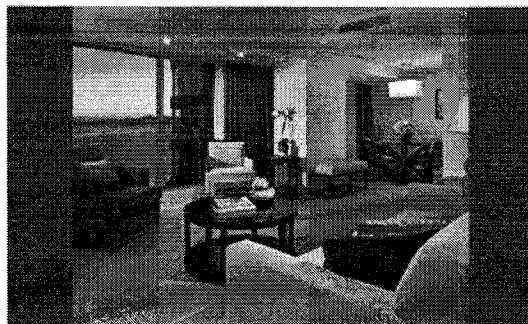
- Crib • Rollaway bed

More info: 866-536-8117

Details

- | | | |
|--|--|-------------------------------|
| • Air conditioning | • HDTV | • Pay movies |
| • Bathrobes | • Hypo-allergenic bedding available | • Pillowtop mattress |
| • Blackout drapes/curtains | • In-room climate control (air conditioning) | • Plasma TV |
| • Connecting/adjoining rooms available | • In-room massage available | • Premium TV channels |
| • Daily housekeeping | • In-room safe (laptop compatible) | • Private bathroom |
| • Designer toiletries | • iPod docking station | • Refrigerator (on request) |
| • Desk | • Iron/ironing board | • Room service (24 hours) |
| • Digital TV service | • Microwave (on request) | • Separate bathtub and shower |
| • Down comforter | • Minibar | • Slippers |
| • DVD player | • Number of bathrooms - | • Turndown service |
| • Free newspaper | | • Video-game console |
| • Free toiletries | | |
| • Free WiFi | | |
| • Hair dryer | | |

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Inadequate dispersion.

Deluxe Suite, Accessible**1 King Bed**

1120-sq-foot (111-sq-meter) room with bay views

Relax - In-room massage available

Internet - Free WiFi

Entertainment - 48-inch plasma TV with premium channels, pay movies, iPod dock

Food & Drink - 24-hour room service, minibar, microwave (on request), and refrigerator (on request)

Sleep - Pillowtop bed, hypo-allergenic bedding, a down duvet, blackout drapes/curtains, and turndown service

Bathroom - Private bathroom, separate bathtub and shower, bathrobes, and slippers

Practical - Laptop-compatible safe, free newspaper, and iron/ironing board; free rollaway/extra beds and free crib/infant beds available on request

Comfort - Air conditioning and daily housekeeping

Non-Smoking

Connecting/adjoining rooms can be requested, subject to availability

Sleeps 3 people (including up to 2 children)

Bed choices

- 1 King Bed

Extra beds available

- Crib • Rollaway bed

More Info: 888-538-8117

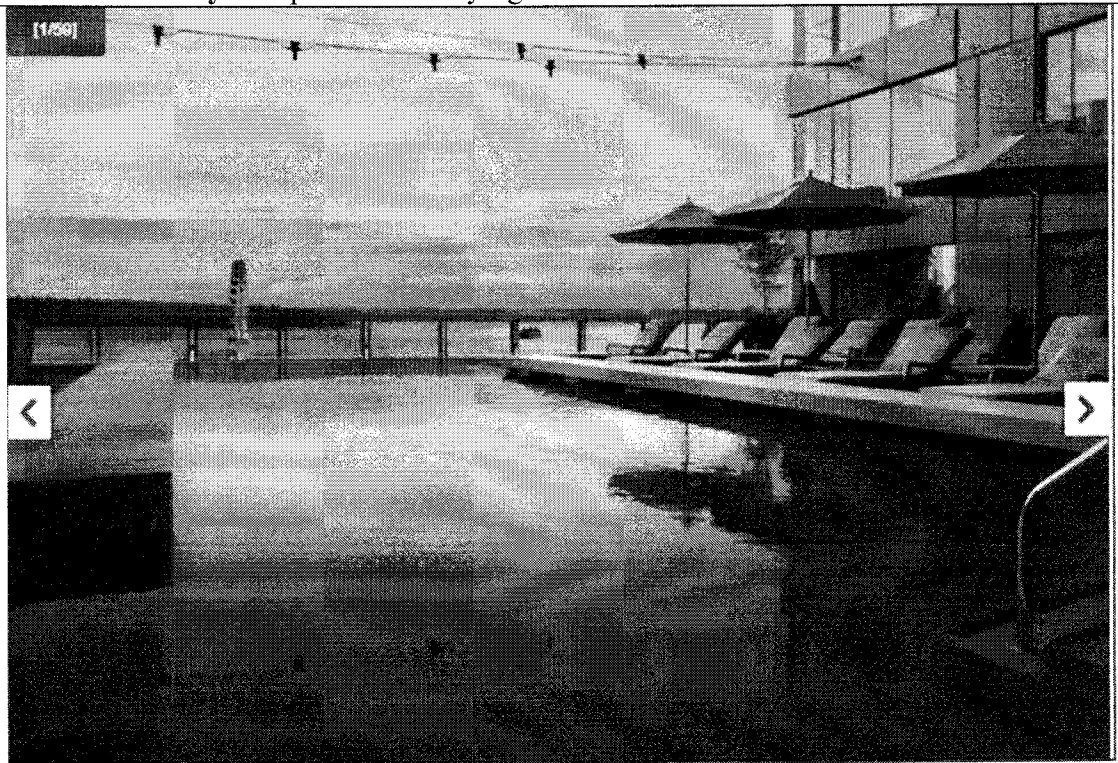
Details

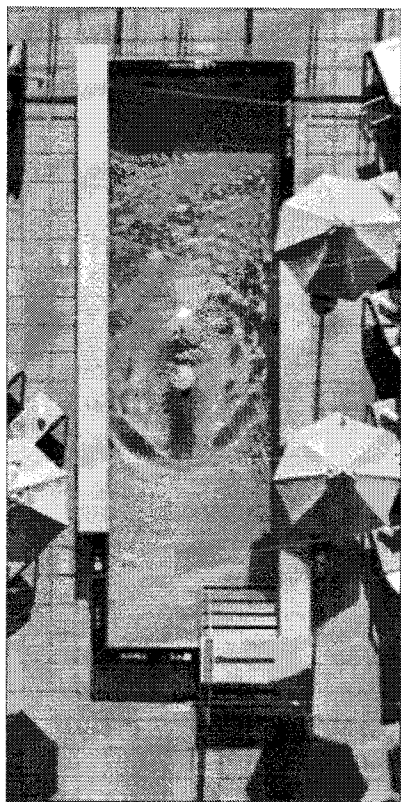
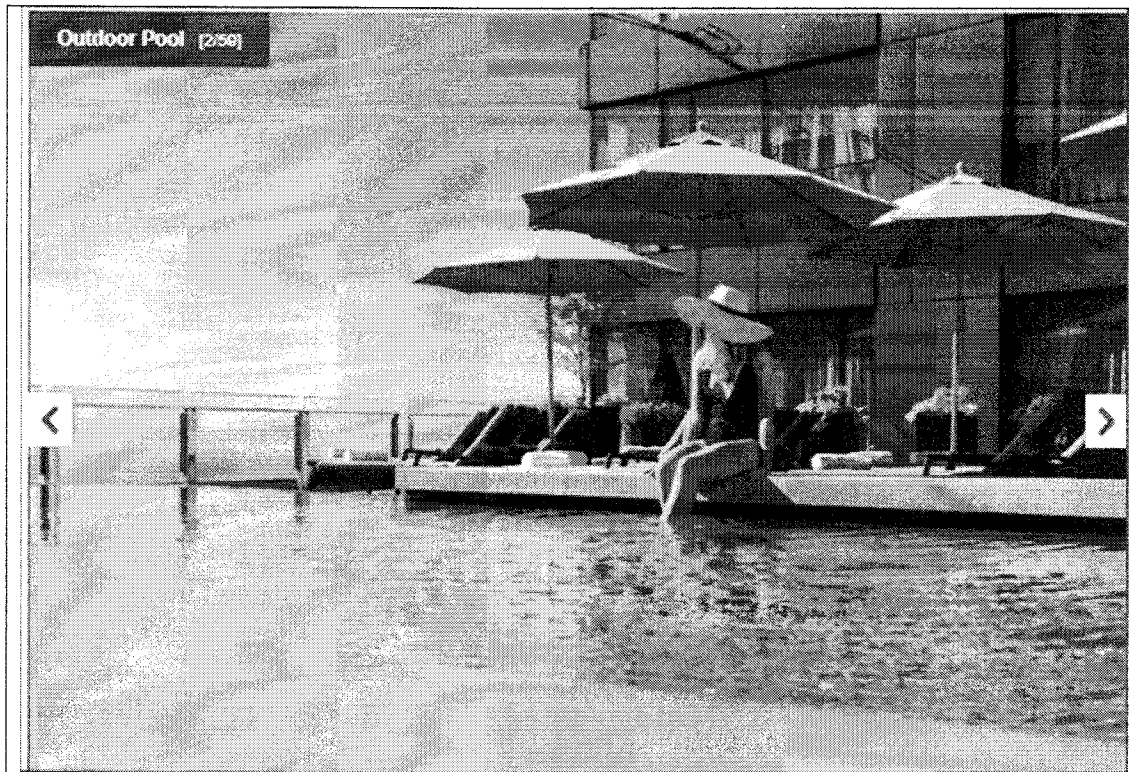
- | | | |
|--|--|-------------------------------|
| • Air conditioning | • HDTV | • Pay movies |
| • Bathrobes | • Hypo-allergenic bedding available | • Pillowtop mattress |
| • Blackout drapes/curtains | • In-room climate control (air conditioning) | • Plasma TV |
| • Connecting/adjoining rooms available | • In-room massage available | • Premium TV channels |
| • Daily housekeeping | • In-room safe (laptop compatible) | • Private bathroom |
| • Designer toiletries | • iPod docking station | • Refrigerator (on request) |
| • Desk | • Iron/ironing board | • Room service (24 hours) |
| • Digital TV service | • Microwave (on request) | • Separate bathtub and shower |
| • Down comforter | • Minibar | • Slippers |
| • DVD player | • Number of bathrooms - | • Turndown service |
| • Free newspaper | | • Video-game console |
| • Free toiletries | | |
| • Free WiFi | | |
| • Hair dryer | | |

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Inadequate dispersion. Unlike other rooms, this one offers no photo of bathroom.

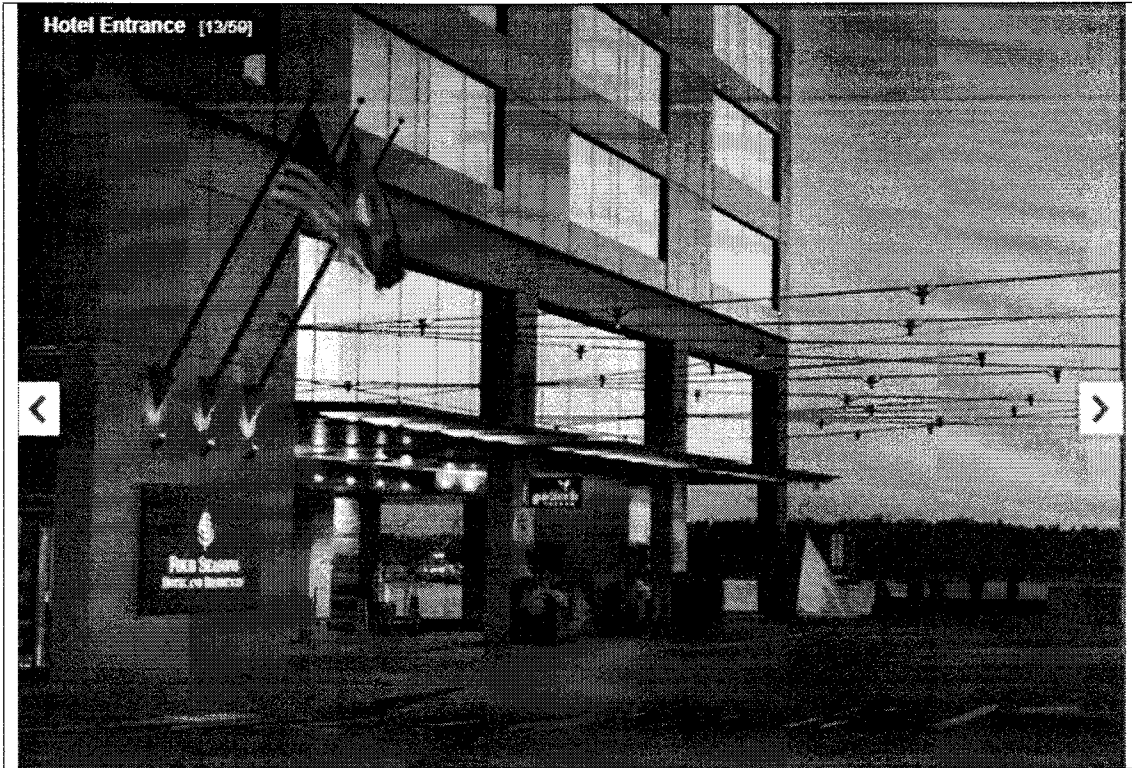


ADA Deficiency: No photos identifying accessible features.





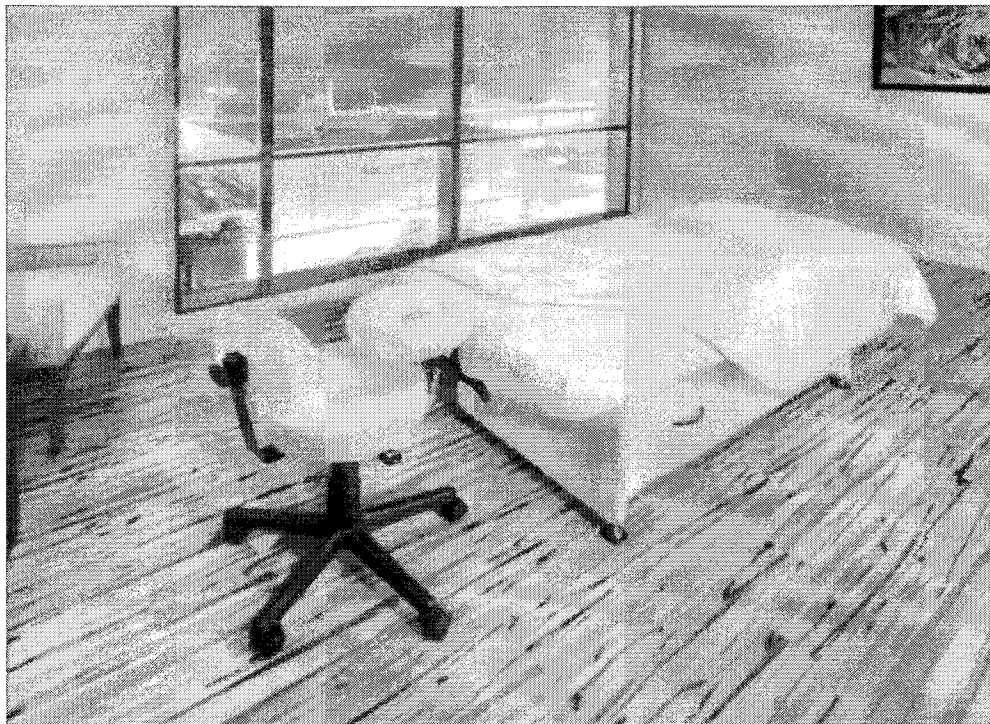
26 **ADA Deficiency:** Apparently inaccessible pool.
27
28



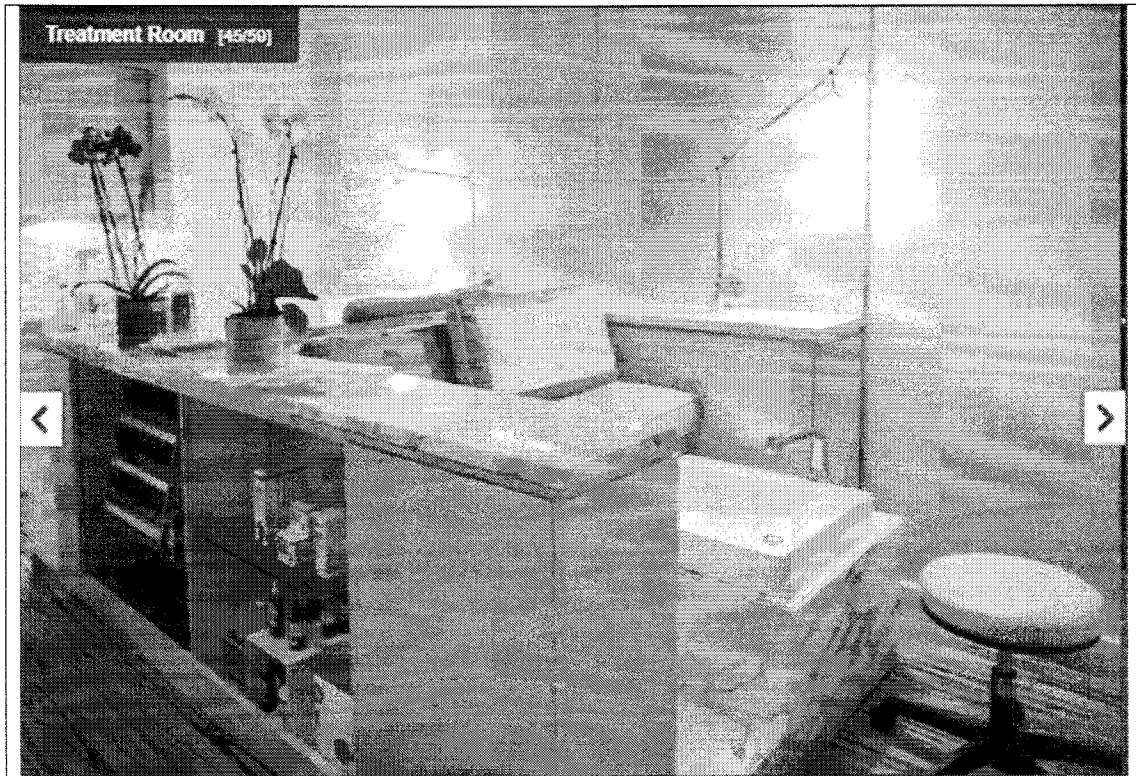
ADA Deficiency: No apparent marked passenger drop off zone.



ADA Deficiency: No apparent bar accessibility.



ADA Deficiency: Non-compliant treatment tables.

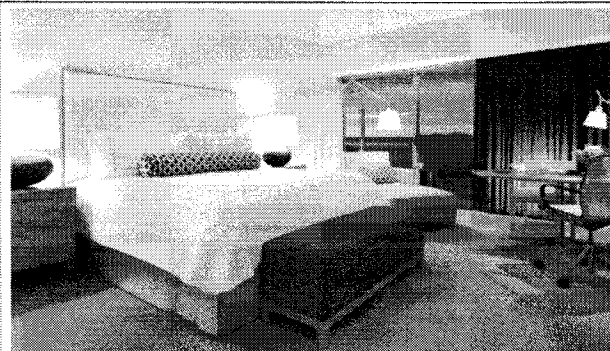


ADA Deficiency: Inaccessible treatment area.

1ST PARTY BOOKING WEBSITE
WWW.FOURSEASONS.COM/SEATTLE

No Accessibility Information

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.



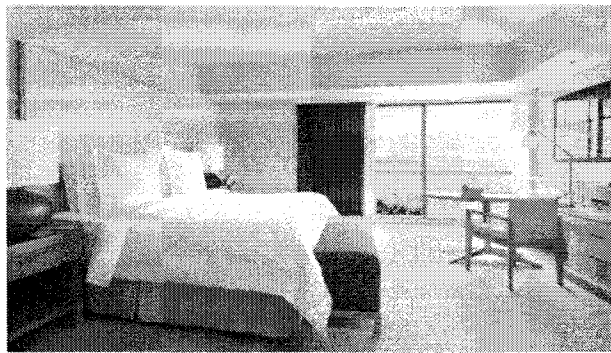
PRIME BAY-VIEW ROOM [Click here to access Exclusive Offer anyt](#)

- ☐ ONE KING BED, ONE ROLLAWAY OR ONE CRIB
- ☐ 449 - 561 SQ. FT. (44 - 61 M2) / 4TH TO 10TH FLOORS
- ☐ 3 ADULTS, OR 2 ADULTS AND 1 CHILD

CHECK RATES

DETAILS

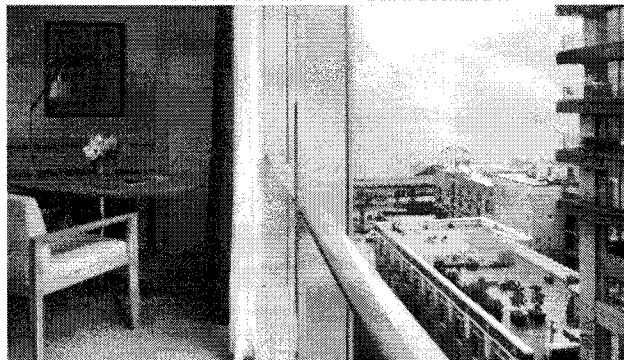
ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs – inadequate dispersion of accessible rooms.



DELUXE BAY-VIEW ROOM →

- ☐ ONE KING BED OR TWO DOUBLE BEDS. ONE ROLLAWAY OR ONE CRIB IN KING-BEDDED ROOM ONLY
- ☐ 470 - 660 SQ. FT. (44 - 61 M2) / 3RD TO 10TH FLOORS
- 👤 KING-BEDDED ROOM: 3 ADULTS, OR 2 ADULTS AND 1 CHILD. DOUBLE-BEDDED ROOM: 4 ADULTS, OR 3 ADULTS AND 1 CHILD, OR 2 ADULTS AND 2 CHILDREN, OR 1 ADULT AND 3 CHILDREN.

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs – inadequate dispersion of accessible rooms.



PARTIAL BAY-VIEW ROOM →

- ☐ ONE KING BED OR TWO DOUBLE BEDS. KING-BEDDED ROOM: ONE ROLLAWAY OR ONE CRIB. DOUBLE-BEDDED ROOM: ONE CRIB.
- ☐ 450 - 475 SQ. FT. (42 - 44 M2) / 5TH TO 16TH FLOORS
- 👤 KING-BEDDED ROOM: 3 ADULTS, OR 2 ADULTS AND 1 CHILD. DOUBLE-BEDDED ROOM: 4 ADULTS, OR 3 ADULTS AND 1 CHILD, OR 2 ADULTS AND 2 CHILDREN, OR 1 ADULT AND 3 CHILDREN.

CHECK RATES

DETAILS

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs – inadequate dispersion of accessible rooms.



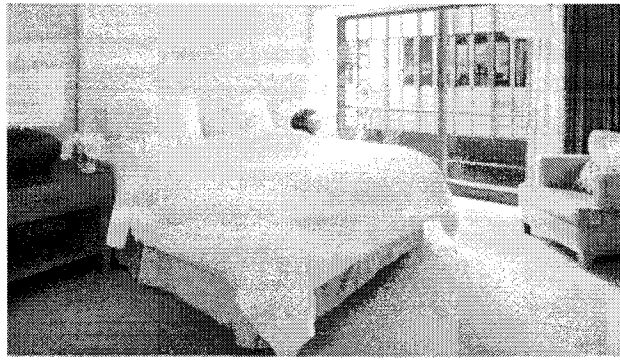
DELUXE SEATTLE-VIEW ROOM →

- ☐ ONE KING BED, ONE ROLLAWAY OR ONE CRIB
- ☐ 449 - 516 SQ. FT. (42 - 46 M2) / 9TH TO 10TH FLOORS
- 👤 3 ADULTS, 2 ADULTS AND 1 CHILD OR 1 ADULT AND 2 CHILDREN

CHECK RATES

DETAILS

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs – inadequate dispersion of accessible rooms.



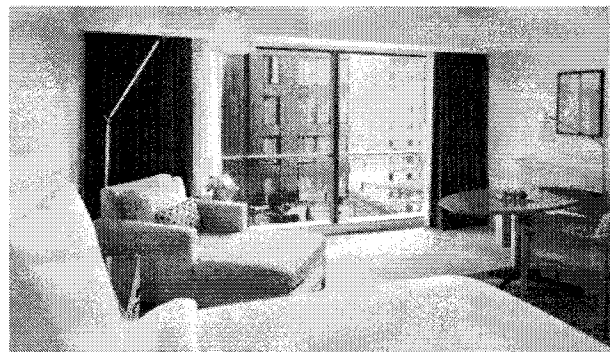
SEATTLE-VIEW ROOM →

- ☐ ONE KING BED OR TWO DOUBLE BEDS. KING-BEDDED ROOM: ONE ROLLAWAY OR ONE CRIB. DOUBLE-BEDDED ROOM: ONE CRIB.
- ☐ 449 - 561 SQ.FT. (42 - 52 M2) / 3RD TO 10TH FLOORS
- ☐ KING-BEDDED ROOM: 3 ADULTS, OR 2 ADULTS AND 1 CHILD. DOUBLE-BEDDED ROOM: 4 ADULTS, OR 3 ADULTS AND 1 CHILD, OR 2 ADULTS AND 2 CHILDREN, OR 1 ADULT AND 3 CHILDREN.

CHECK RATES

DETAILS

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs – inadequate dispersion of accessible rooms.



SUPERIOR KING ROOM →

- ☐ ONE KING BED, ONE ROLLAWAY OR ONE CRIB
- ☐ 449 - 516 SQ.FT. (42 - 48 M2) / 3RD TO 7TH FLOORS
- ☐ 3 ADULTS, 2 ADULTS AND 1 CHILD OR 1 ADULT AND 2 CHILDREN

CHECK RATES

DETAILS

ADA Deficiency: Failure to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs – inadequate dispersion of accessible rooms.

END